Fire Brigades Union consultation submission on the Authority draft Public Safety Plan/Integrated Risk Management Planning Document

This consultation submission comprises of, and is representative of, the views of Buckinghamshire Fire Brigades Union (FBU) members. It also incorporates observations from FBU officials and representatives collated during the consultation period.

A Fire and Rescue Service (FRS) is more directly answerable to the public it serves than ever before. The breadth, depth and quality of service it provides must be determined by **informed** consultation with the public and with key stakeholders.

The majority of members of the public have little or no knowledge about the intricacies of large-scale risk management services or their cost. What this means is that FRS's have a responsibility to inform and educate before they embark on consultation exercises.

In support of this ethos, The Fire and Rescue Service National Framework states that a Fire Authority's Integrated Risk Management Plan (IRMP) **must:**

'reflect effective consultation throughout its development and at all review stages with the community, its workforce and representative bodies, and partners'

One of the more prominent theme's that has emerged from Fire Brigades Union members during the consultation process is the failure of the document to incorporate any specific, defined proposal to change or amend current service provision.

Instead there are vague and difficult to understand descriptions of what strategies are being proposed, in the form of broad review topics, which **may** result in a change to service provision dependent upon the outcome of the review (s). There is also no detail of what impacts to risk levels are likely to result from any outcome.

 This is a somewhat unorthodox approach when compared with IRMP/PSP documents of other FRS's. The majority of other Fire and Rescue Service IRMP/PSP's include clear strategies and defined outcomes which detail exactly what change is being proposed to current/existing service provision and the corresponding impact this proposed change will have on risk levels.

It is commendable that the Authority is trying to engage the public and key stakeholders at the very formative stages of development of any proposals. However, rather than encourage engagement in the consultation process the lack of any clearly defined strategies or proposals actually impedes and deters the public from contributing to the consultation.

Until the Fire Authority detail what change to service provision **is** being proposed as opposed to what is change **may** follow a broad review then there is little incentive for people to contribute to this PSP consultation process.

Q.Would it not be better to delay the publication of the PSP until such time as the outcomes of the review process have been clearly identified including the impact that any defined proposal will have on service provision and risk levels?

The public, employees, representative bodies and partners would then have something tangible to consult on. A clearly defined proposal would greatly encourage engagement from these groups. There is not a single specific outcome included in the document. In its current format it is little more than an elaborate hypothesis.

However, the document does provide assurances on page 21 that any proposed change to service provision **will be consulted upon.**

Q.Will the Authority confirm that consultation on the outcomes of the review process, including any specific proposals which change or amend current levels of service provision, will take place over a minimum of 3 months so as to mirror the length of consultation afforded on the PSP?

Q.Who will be consulted?

Q.When will that consultation commence?

Members of the public were not consulted when the Authority implemented changes resulting from reviews that were carried at as part of the existing PSP. Specifically, the Authority did not seek the views of the public when changes were made to crewing models at Aylesbury Fire Station which had a direct impact upon service delivery.

The outcome of the PSP review resulted in the Urban Search and Rescue (USAR) provision being amalgamated into Aylesbury Fire Station. Previously USAR resources functioned separately from Aylesbury Fire Station. Therefore if USAR resources were required there would be no direct impact on the front line service provision provided by Aylesbury.

However, the amalgamation of the two functions meant that now if USAR resources were mobilised to an incident there would be a direct impact upon Aylesbury Fire Station in effect reducing the current level of service the public received. The public were not included in this decision making process which resulted in a change and a reduction of service provision.

Q.Does the Authority now recognise that it was a mistake not to consult at the very least the communities of Aylesbury and the surrounding areas of a change to their Fire Service which could have a detrimental impact on the availability of front line fire appliances?

Q.Will the Authority **guarantee** that any outcome from proposed areas of review will be subject to meaningful consultation with the public and key stakeholders, including the provision of necessary information such as risk and impact assessments?

PSP Page 20

PSP Proposal's

'Systematically change our current approach to managing risks in each of the five catchment areas identified at page 16 of this plan.'

Q.What is the current approach to managing risk, what does it incorporate, how is it measured, have targets been reached and why is this information not contained within this PSP?

Q.Why is the current approach to managing risk no longer viable, and why does it need to change?

'This will embrace __identifying__ and implementing:'

This repeated statement acknowledges that BMKFRS has not yet identified any specific strategies to manage risk but instead is proposing to do so. It would be most appropriate to consult with the public when these strategies are no longer hypothetical aspirations for a review process but are actual specific proposals for the public and stakeholders to consult on.

Q.How does the Authority expect members of the public to engage effectively in this consultation when they are being asked to provide a view, a comment or opinions on effectively what are a broad range of aspirations?

What response is being invited from the 5 proposals? It is giving people information but in a format that does not encourage a response. The parameters for each review and the potential outcomes are so broad and vague that it is impossible for a meaningful consultation to take place. It is an informative statement telling people what is going to be done and therefore greatly restricts the response that someone can give.

Q. Does the Authority acknowledge that as part of a sound business plan service managers should be constantly reviewing performance to determine if improvements can be realised? If the answer is yes, does the Authority then acknowledge that telling the public that they will conduct reviews of performance and/or service provision to ascertain if improvement can be made will be an expectation of the public and thus unlikely to elicit a response? If the answer to the previous question is no, then what kind of response, views or comments was the Authority trying to get from the public given that there is not really a specific question being asked?

Q. How does the Authority expect the public to respond to a series of proposals which contain insufficient information to enable an informed response?

Instead of being entitled 'what we propose to do' it could be re-written to read 'what we should do'. The public would expect its fire service to constantly review how it manages risk

and to identify the best strategies to mitigate the impact of risk combined with identifying efficiencies wherever possible.

These 'proposals' cannot really be disputed because it details what a public sector service should be doing.

- *'The right balance between measures to prevent and protect against risk and residual capacity needed to respond to emergencies'*

Q.How is the current balance wrong or no longer the right balance? Where is the information to support this statement so that an informed contribution can be made?

Q.What factors are used to measure the right balance between risk and capacity needed to respond?

Q.What is the current balance?

Q.What are the current risks, how are they measured and what current strategies are in place to mitigate the impact of these risks?

- *'The most appropriate crewing models relative to current and expected levels of demand and risk;'*

Q.What are the current crewing models?

Q.Are these models no longer appropriate and if so why are they not appropriate?

Q.Is there an option of staying the same?

Q.What change has already been undertaken in terms of crewing models?

- *'Changes to the number of staff, fire appliances (fire engines) and other specialist appliances required to better fit with normal, day to day demand patterns;'*

The document should inform the reader of what changes have already taken place in terms of the number of staff, any changes to the fire appliances or how they are crewed. It should also include response standards and what the current availability of fire appliances is.

It would appear that the only direction of travel in terms of the number of staff would be downward.

The PSP should include data regarding changes to the establishment level during the last few years. For example: (statistics from DCLG website)

Between March 2010 and Sept 2014 there has been a reduction in the number of whole-time firefighters in the role of firefighter from **203 FF's in 2010 to 171 FF's 2014.**

There has been a reduction in the number of FF's in the role of crew manager and watch manager from **141CM/WM in 2010 to 90 CM/WM in 2014**.

Closing the Fire Service's control room has also resulted in a loss of **25 front line FF's**

Therefore there has already been a reduction of 109 frontline fire fighters in the last 4 years.

It should also be noted that during that period there has been a reduction of **41** on-call or retained FF's employed by the service (217 to 176).

Q.Does the Authority agree that it if proposing a review of numbers of FF's/staff that the public should be given information as to what reductions or changes have already taken place.

According to the Medium Term Financial Plans produced by the Authority the cost of the Authority Finance department has increased by £1.5 million from £3.67million in 2012 to £5.1million in 2014.

Q. Will the Authority guarantee that before making any further cuts to front line service provision that all possible savings will be achieved from back office functions?

Q. Will the Authority outsource back office functions such as Human Resources and Finance in order to protect front line service provision?

- *The right number and location for fire stations which may involve moving, merging, closing or co-locating with other blue light services'*

Q.What kind of response is the Authority expecting from this statement?

Q.Would the Authority not agree that until such time as a decision has been taken on what will be involved in terms of moving, merging, closing or co-location that there is too little information for the public to provide a considered response to this proposal?

The overwhelming response from FBU members and family and friends that they in turn have consulted with is that these proposals are too generic; they provide no real detail or information which makes it very difficult to put forward any views or comments.

The Authority should not need to seek the public's views in order to carry out a review of the service. There is an expectation that these types of reviews would form part of a sound business model. No one would disagree that a business should not undertake regular reviews of its functions in order to try and identify areas where it could improve and provide a better service to end users. When those review produce possible outcomes, then it would be most appropriate and beneficial to seek the views of the public and stakeholders.

PSP Page 21

Very few people understood what the page title 'reviewing the geo-spatial distribution of our capacity' actually means. It is difficult to relate to and therefore difficult to respond to.

The first paragraph states that 'it is evident that there is a genuine need to seek alternative ways of delivering front-line services in a more efficient and economical way' but it does not substantiate this claim with any evidence.

Q.What is the evidence to support that there is a genuine need to change current levels of service and where is found; or is the genuine need based on the responsibility the Authority has to constantly review service delivery to ensure efficiency and effectiveness?

Data and Statistics

The provision of information is integral to an effective consultation process.
Some of the information incorporated into the PSP, particularly in relation to fire statistics, is misleading and does little to afford members of the public a wider understanding of risk in their communities. This will impede the ability of the public to provide an informed contribution to the consultation process.

Rather than inform the public one could argue that some of the information is being presented is a non-objective and biased manner in an attempt to lead people into a false belief or understanding about risk levels.

On page 7, entitled 'strategic context' and under the heading 'fewer incidents…reducing risk….a safer environment' it states that:

 "There has been a dramatic reduction in the number of fire related incidents and consequent deaths and injuries"

The above statement and the statistics showing a 54% reduction in Fires and 68% reduction in non-fatal fire casualties is misleading.

Using the same statistics taken from the Department for Communities and Local Government (DCLG) website you could present a very different picture.

For example:

Accidental dwelling fires between 2002/03 to 2012/13 have gone up 9%

Or

Non-fatal fire casualties have gone up 50% in the last year.

The document acknowledges that to review over a period of ten years leads to an inaccurate representation or portrayal of risk because it fails to factor in the many changes that have taken place over that period.

BMKFRS has taken steps to manage and reduce risk gradually over that period of ten years. This has been achieved primarily through previous IRMP/PSP processes. Society and the Fire Service have changed and adapted over that timescale to try and reduce risk. It is therefore unreasonable to draw comparisons over a period of ten years. It is misrepresentative and ultimately it is misleading the public on the subject of risk.

The current IRMP/PSP reviewed similar data streams not over a ten year period but over a 2 year period. These are two extremes. 2 years is insufficient to examine enough data to be able draw reasonable conclusions and data over 10 years is too long.

A five year period would be more appropriate to give the public a better understanding of levels of risk.

Yes, there has been a considerable reduction in the number of fires in the last 10 years but much of that reduction has been around fires that very rarely pose a risk to life.

For example, there has been a significant reduction in the number of secondary fires and road vehicle fires.

Comparing the DCLG statistics from 2002/3 to 2012/13, secondary fires have fallen from 2137 in 2002/3 to 852 in 2012/13. During the same period primary fires in vehicles has seen a significant decline from 1109 to 308. These two categories of fire account for over 70% of the total fires for the year.

As presented, the statistics will lead people to believe that exposure to life risk or property risk, from fire has more than halved in the last ten years. This is inaccurate.

Whilst there has indeed been marked reduction in total fires during the last ten years the types of fire related incidents which pose the greatest risk to life and property have not seen such a

decline and if fact have remained relatively stable over that period albeit with an increase in population and the number of dwellings.

In order to give the public a better understanding of risk it should be broken down into various categories to better and more accurately represent the type and number of incidents that pose a greater risk to life and property (see the tables below). This approach would support the FRS National Framework which states that an IRMP **must:**

'Reflect up to date risk analyses and the evaluation of service delivery outcomes.'

The following data has also been taken from the DCLG website.

Fires last 5 years

09/10	10/11	11/12	12/13	13/14
2842	2708	2575	2089	2128

Primary fires dwelling

09/10	10/11	11/12	12/13	13/14
433	422	457	463	389

Accidental dwelling fires

09/10	10/11	11/12	12/13	13/14
372	365	417	431	362

Non-fatal casualties accidental dwelling fires

09/10	10/11	11/12	12/13	13/14
34	41	50	42	61

To use very generic figures as the PSP does on page 6 does embrace the principles of an 'informed' consultation process. To not breakdown and categorise the types of fire will result in members of the public having to draw their own conclusions as to what type of fire or incident the statistics are referring to.

Q.Does the Authority agree that it would be better to give the public a breakdown of fire statistics over a 5 year period which will mean that they are better informed and have a better understanding of risk and, from a response perspective, the work that the BFRS is involved in?

The presentation of information in more prescriptive format will invariably support a more effective consultation process because individuals will have a better understanding of risk, and of the response work BFRS is regularly engaged in.

A reduction in the number of incidents does not necessarily always correlate with a reduction in serious life risk. It depends very much on the type and severity of the incident in question and the response standards of the FRS. For example, if you compare the data from 2008/09 and 2011/12 there was a considerable reduction in the number of fires attended and number of RTC's attended. However, there was a significant increase in the number of lives saved in those types of incidents between those two years.

This is represented in data reported in the Annual Statements published by the Fire Authority:

'Activity levels' taken from BFRS Annual Statements 2008/09-2012/13

Year	Emergency incidents attended	Fires attended	Road Traffic Collisions (RTCs) attended	Other incidents attended excluding false alarms	Lives saved from fire	Lives saved from RTC's	Major incidents
08/09	7958	2918	545	4485	25	170	9
09/10	7346	2787	506	4069	34	401	12
10/11	7459	2749	544	4109	40	292	11
11/12	7469	2664	474	4291	41	329	8
12/13	6420	2071	471	3413	28	312	9

The statistics should represent a wider information base to promote knowledge and understanding on the number and types of incidents and also their correlation to risk.

Furthermore, people are not just at risk from fire but other incidents such as Road Traffic Collisions and Flooding. The data encapsulating different types of incidents and corresponding risk should also be included to help inform the public and give them the necessary knowledge and understanding to engage effectively in the consultation process.
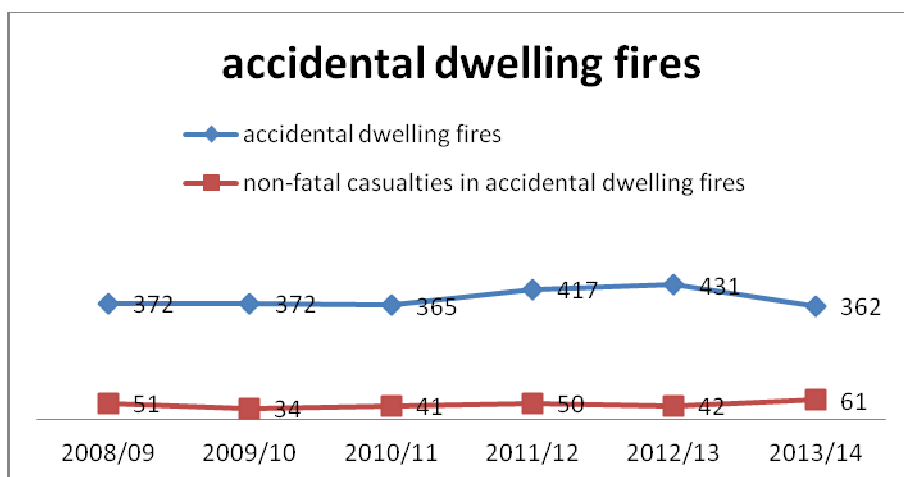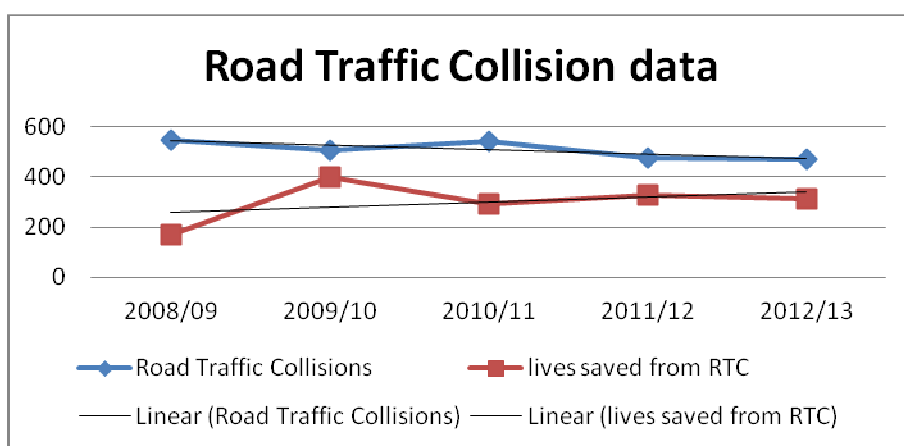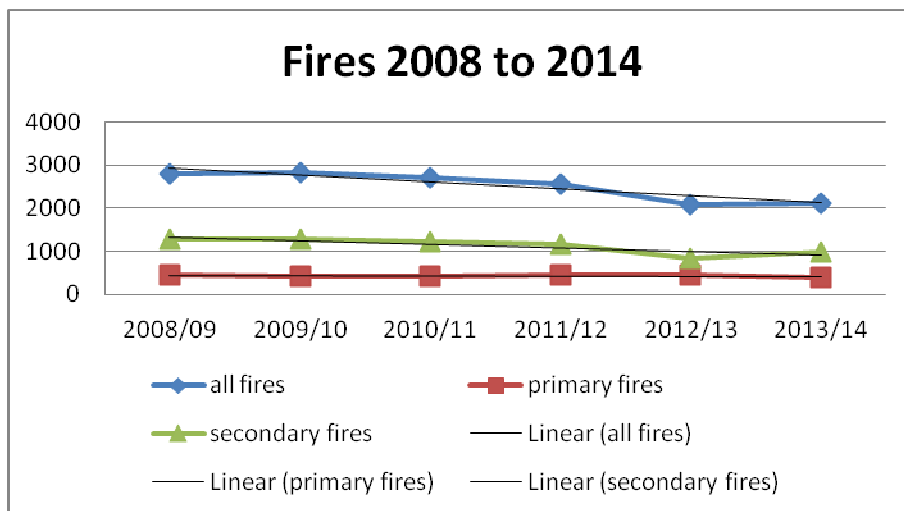
Flooding

09/10	10/11	11/12	12/13	13/14
88	184	172	145	184

RTC

09/10	10/11	11/12	12/13	13/14
543	516	466	481	456

Page 9 of the PSP includes a graph showing a downward trend in the total number of incidents. Similar to the previous arguments, a better and more accurate representation of incident trends would be achieved if incidents types were categorised into appropriate groupings. This approach would better demonstrate compliance with the FRS National Framework which states that an IRMP **must:**

'Identify and assess all foreseeable fire and rescue related risks …'

The below graph's give an example of how information relating to incidents and risk could be better portrayed and give the public and key stakeholders a much clearer understanding of fire and rescue related risks.

Q. Does the Authority agree that this approach would be beneficial and that by providing people with this information would mean that they have a better understanding of fire and rescue related risks and would be better informed to respond to the consultation?

Fires 2008 to 2014

Legend: all fires, primary fires, secondary fires, Linear (all fires), Linear (primary fires), Linear (secondary fires)

Road Traffic Collision data

Legend: Road Traffic Collisions, lives saved from RTC, Linear (Road Traffic Collisions), Linear (lives saved from RTC)

accidental dwelling fires

Legend: accidental dwelling fires, non-fatal casualties in accidental dwelling fires

	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
accidental dwelling fires	372	372	365	417	431	362
non-fatal casualties	51	34	41	50	42	61

Current IRMP data and performance monitoring

As well as data detailing risk in terms of number and type of incidents the PSP should also provide information/data which demonstrates how the Fire Authority is performing against its targets, what future targets are being set and what specific strategies there are for achieving these aims. This approach would comply with the FRS National Framework which states that an IRMP **must:**

'Reflect up to date risk analyses and <u>the evaluation of service delivery outcomes.'</u>

For example, when showing the number of accidental dwelling fires the public should also be given information about what targets the Authority had set to reduce accidental dwelling fires in a given year and how if the Authority has achieved these targets. It should also show what the Authority expects to do in future to further reduce risk by reducing certain incidents such as accidental dwelling fires.

The provision of this type of information would help to ensure that the public and stakeholders have a good understanding of risk, types of risk, current measure to reduce risk, performance standards and if and what may need to change.

Basically, it is educating the public as to what we do and providing this information in a non-biased format. This would promote understanding and encourage direct engagement from these groups in the decision making process of the Authority.

Historically, the Authority would review its performance against agreed IRMP targets on a quarterly basis. However in recent years this has not been the case and in the last year there was only one meeting where members of the Fire Authority could scrutinise the Service's performance against agreed standards.

The PSP/IRMP should include performance data and targets such as:

- Number of accidental dwelling fires.
- Number of accidental dwelling fires confined to room of origin.
- Number of fires in non-domestic premises
- Number of Road traffic collisions (RTCs)
- Number of people killed or seriously injured in in RTC's
- Number of deliberate dwelling fires

Also the document should inform the public of key response targets so that they have a better understanding of current levels of service provision and can see where the Authority is performing well and where it may need to improve. Any proposal to change service provision must include a measure of current performance so that necessary comparisons can be made.

- % of incidents where persons confirmed trapped and response is within 10 minutes.
- % of incidents responded to in 10 mins

- % of incidents receiving correct pre-determined attendance in 20 mins
- % of Wholetime pump availability
- % of Retained availability

Q. DCLG statistics relating to fire incident response times documents that Buckinghamshire Fire and Rescue Service has an average response time to fires and dwelling fires **2 mins slower** than the National average. Does the Authority agree it would be detrimental to public safety if any changes resulted in a further increase in response times?

PSP Page 22: Day Crewed/Establishment levels

The document states:

'The day crew system has been adopted as a middle ground between wholetime and on-call'

Unlike the on-call of retained duty system, the day crew system provides 24/7 cover. It is misleading to refer to day crew FF's as a middle ground when they guarantee appliance availability 24/7 365 days a year.

One of the areas that the PSP is proposing to review is the Day Crew duty system. On page 22 the PSP notes that:

'*The scope of the new review is to consider operational alternatives to safeguard the sustainability and resilience of maintaining effective operational cover for the communities in these areas.'*

The Authority has adopted a deliberate strategy of **not** recruiting frontline firefighters. This is despite the establishment level falling below agreed levels coupled with a retirement profile which indicates that there will be a serious shortage of front line FFs within 12 months. This shortage will not just impact upon the sustainability of the day crew duty system but all duty systems.

There has not been a commitment to maintain an agreed establishment level. Instead, a strategy has introduced in which the Authority 'manages vacancies' with short term solutions such as the use of overtime or the 'bank system' in order to save money.

Q. Does the Authority acknowledge that the long term sustainability of any crewing model relies on resourcing that crewing model to agreed establishment levels?

Q. Does the Authority agree that a policy of not recruiting FF's and therefore not committing to maintain agreed establishment levels is the primary reason why the day crew duty system in particular is becoming unsustainable?

Failure to recruit, a forced change?

The sustainability of any crewing system relies first and foremost on a commitment by the Authority to provide the agreed necessary resources (the right number of FF's) required for that particular duty system to function efficiently and effectively.

Members have raised serious concerns that the Authority is forcing a change in all crewing models by not recruiting frontline FF's and consequently driving down the establishment figure.

By continuing to adopt this strategy the Authority will have no choice but to change crewing models in order to accommodate a year on year reduction in the number of front line FFs. The public and key stakeholders will have very limited influence over any decision to revise crewing models if they are being retro-fitted to align with a falling establishment.

Therefore any consultation process or any review on the issue of staff numbers and duty systems is somewhat disingenuous. The decision to change crewing models has to a large extent already been pre-determined. The public and key stakeholders will at best be afforded a limited opportunity to effect what change takes place, but will have to accept or agree that a change will take place.

It is of course the prerogative of the Authority to make decisions around the budget and establishment levels. However, this should be done in a genuine consultation process with public and key stakeholders.

Q. Is there an opportunity for no change following any review on duty systems or crewing models.

Q. Will the Authority recruit to maintain current front line establishment levels?

Q. Is it already a forgone conclusion that each review will return an outcome which proposes a reduction in front line service provision?

Additional comments/queries

Pg 6

how is the average cost of a wholetime FF calculated, and what posts does it include? It must be acknowledged that when you refer to a wholetime FF the public will generally interpret this to mean a frontline operational FF who is on a salary of just under 29k.

They will not associate senior managers, including the chief fire officer who is on a salary of 145k, to be included in the category of wholetime FF.

It is therefore potentially a misleading statistic from the point of view of cost. It is also misleading from the point of view that it will lead people to believe that there are 309 operational frontline firefighters when the actual figure is closer to 260 with approximately 45 non station based FF's.

As the statistics also include WT fire appliances it leads one to conclude that 309 WT FF's are employed to ride 13 fire engines. This is clearly wrong but it is what is being presented. It makes it appear that there is an abundance of frontline FF's in relation to the number of fire engines and consequently could be used as an argument to further reduce the number of frontline operational ff's.

It is recognised that the general public are unlikely to know the difference between the roles of CM,WM,SM,GM,AM and BM however the statistics in terms of numbers and associated costs may be better presented and understood if they were to reflect station based personnel and non-station based personnel.